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August 7, 1997

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: MM Docket No. 97-138

Dear Mr. Caton

Transmitted herewith, on behalf of Ital-Net Broadcasting Corporation, licensee of Standard Broadcast Station WRDM, Bloomfield, CT, are the original and four copies of its Comments in response to the Notice of Proposed Rule Making in the above-referenced proceeding.

Very truly yours

Stanley S. Neustadt
Stanley S. Neustadt

Encl.



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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission

In the Matter of)
)
Review of the Commission's Rules) MM Docket No. 97-138
regarding the main studio and)
local public inspection files of)
broadcast television and radio stations)
)
47 C.F.R. §§ 73.1125,)
73.3526 and 73.3527)

To: The Commission

COMMENTS OF ITAL-NET BROADCASTING CORPORATION

Ital-Net Broadcasting Corporation ("Ital-Net"), the licensee of Standard Broadcast Station WRDM, Bloomfield, CT, by its attorneys, pursuant to Section 1.415 of the Commission's Rules, files these Comments in support of the proposals in this proceeding to liberalize the rules governing the location of the main studio and the location of the file available for public inspection. In support of the proposals, Ital-Net states:

1. Station WRDM is licensed to Bloomfield, CT, a community of some 10,000 population, located about ten miles from Hartford, CT, with a population of some 135,000, which is the State capital. In accordance with the current Section 73.1125(a) of the Commission's Rules, the main studio of the station is located in Hartford (within the station's city grade contour), and in accordance with the current Section 73.3526, its file available for public inspection is located in the Bloomfield Town Clerk's office. Ital-Net respectfully urges that its own interests would be better served, with no harm, and possible benefit, to its listening public, if it were permitted to maintain

its public file at its main studio, whether that studio were located, as it is, within its city grade contour, or at a main studio convenient to that public, even outside that contour.

2. Maintaining the public file at a location other than the station's main studio has created problems for Ital-Net. Persons in the Clerk's office have improperly separated items in the file by year, and some items have been missing. Recently, it became necessary to reconstruct the entire file. This type of problem could be alleviated if the file were maintained by knowledgeable personnel at the station. The station has had to keep a complete duplicate file at the main studio, in any event.

3. The Town Clerk has informed the station that no one has asked to examine the public file, other than station representatives and F.C.C. inspectors. On the other hand, a few persons have examined the file at the studio in Hartford. The address of the studio and its phone number do appear in the telephone directory utilized in Bloomfield. Except at the time a renewal application is filed, *i. e.*, at eight year intervals, it is hardly known that the public file is located at the Town Clerk's office in Bloomfield. This surely confirms the Commission's own conclusions as set forth at Paragraph 21 of the NPRM.

4. Ital-Net also supports some liberalization of Section 73.1125, the main studio rule, itself. From almost every point of view, of the public as well as of the station, the location of the main studio in the central city rather than in a nearby suburb, has been beneficial. The Commission recognized this when it amended the main studio rule to its present form. If it should ever become necessary, however, for Ital-Net to move its main studio it should be possible to move to any convenient and accessible location, even if it proved to be somewhat beyond the station's city grade contour, without the necessity of seeking specific permission from the

Commission. Several of the proposals in the NPRM would have this salutary effect, and the Commission is urged to adopt one of them.

Respectfully submitted

ITAL-NET BROADCASTING CORPORATION

By Stanley S. Neustadt
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August 7, 1997

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